

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

v.

JORGE ZAMORA-QUEZADA

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Case No. 7:18-cr-00855

**AGREED MOTION TO ALLOW ENTRY INTO EAST HIDALGO DETENTION
CENTER**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant, JORGE ZAMORA-QUEZADA, in the above styled and numbered cause, and files this Agreed Motion to Allow Entry into the East Hidalgo Detention Center and allow Jorge Zamora-Quezada and his wife to meet with Dr. Zamora's attorney in a room to discuss the upcoming Forfeiture and Sentencing proceedings and would respectfully show the Court as follows:

I.

Counsel for Defendant Jorge Zamora-Quezada hereby respectfully requests that Defendant Jorge Zamora-Quezada, his counsel, staff, as well as Meisy A. Zamora, and her attorney be given the following access at the East Hidalgo Detention Center in order to adequately prepare for the upcoming forfeiture and sentencing hearings in this complex case:

- Allow the admittance of Benigno (Trey) Martinez and Stephen Chahn Lee, counsel;
- Allow the admittance of Mayra A. Padilla and/or Samantha Garza, Paralegal;
- Allow the admittance of Meisy A. Zamora, spouse of Jorge Zamora Quezada and her attorney;

- Allow all aforementioned individuals to meet in a room with no barriers to review and sign documentation needed for the upcoming hearings;
- Allow a 24-hour notice of visit(s) to the Warden;
- Allow the admittance of a laptop computer;
- Allow admittance of Mr. Benigno (Trey) Martinez's cell phone;
- Allow the admittance of a USB drive containing case-related materials;
- Allow the admittance of notebooks containing case related material.

Defendant files this Motion not for the purpose of delay or harassment, but rather so that justice may be served.

CERTIFICATE OF CONFERENCE

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Jorge Zamora-Quezada conferred with Assistant United States Attorney Rebecca Yuan, and she agreed to the relief sought in this Motion.

PRAYER

Defendant, Jorge Zamora-Quezada, hereby respectfully requests that his Motion to Allow Entry into the East Hidalgo Detention Center be granted.

Respectfully submitted,

MARTINEZ/TIJERINA, PLLC

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By: /s/ Benigno (Trey) Martinez

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**COUNSEL FOR DEFENDANT
JORGE ZAMORA-QUEZADA**

ALAMDAR HAMDANI
UNITED STATES ATTORNEY

By: /s/ Rebecca Yuan
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**ALAMDAR HAMDANI
UNITED STATES ATTORNEY**

CERTIFICATE OF SERVICE

On January 10, 2025, this motion was served on all counsel of record via ECF.

/s/ Benigno (Trey) Martinez
Benigno (Trey) Martinez